

Municipal Services Agency

**Department of Waste
Management & Recycling**

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**County of
Sacramento**

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California Regional Water Quality Control Board
Central Valley Region
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Subject: Comment on Draft General Waste Discharge Requirements for Compost
Facilities

Dear Mr. Brattain:

I appreciate the opportunity to review and comment on the draft general order for green waste composting facilities. The Sacramento Regional Solid Waste Authority (SWA) is pursuing development of an in-county green waste composting facility through a project we call Sacramento GreenCycle. This department is the lead agency for the SWA. An environmental impact report (EIR) is being prepared for the GreenCycle project.

I offer the following comments for your consideration:

1. General comment as to prescriptive nature of the standards of the discharge specifications. The Board's Central Valley region is the largest in the state with a wide variation in weather patterns, soil types, ground water quality, etc. In recognition of this variation, it seems reasonable to allow for more flexibility in the prescriptive standards. Specification 8 seems to allow some flexibility since the requirements for retention basins may depend on site-specific conditions, depth to ground water, etc., and an equivalent or better alternative liner system may be proposed. I suggest the Board staff consider whether such flexibility might be incorporated in other discharge specifications.
2. Page 9, prohibition 8. Anaerobic digestion (AD) is a processing alternative that the GreenCycle EIR will consider. After the AD process is complete, there is a large quantity of low solids-content liquid wastewater remaining that I'll call "digestate". One potential way to manage the digestate is to bulk it with other green material and then to compost the blend in a more traditional manner with aerated static piles or windrows. Thus, I am concerned that prohibition 8 will make AD infeasible since digestate might be considered a liquid waste. In addition, some composting facilities currently accept liquid wastes from food processors or agricultural generators. For the compost operation, these liquid wastes may provide an important source of nutrients and moisture that would otherwise have to be added while providing generators with a cost-effective management alternative for an otherwise hard to manage waste stream. I recommend staff consider how this prohibition could be replaced with a specification that provides

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some flexibility for compost facility operators to continue to accept liquid wastes while protecting water quality.

3. Page 10, discharge specification B4 and definitions of Additives and Amendments. I am concerned that this specification is impractical if taken to the extreme. Some composting facilities may wish to blend compost with soil-like amendments (e.g., topsoil, sand, etc.) to make blended products for specific markets. If the specifications and definitions of Additives and Amendments are taken too broadly, then compost facilities might have to incur unnecessary costs to construct and maintain impermeable pads only to protect the ground surface from such soil-like amendments.

Once again, I appreciate the opportunity to review and comment on the draft general order for green waste composting facilities. I ask that staff continue to include me on the distribution of materials related to these general orders and look forward to the public hearings which I'm sure will follow, hopefully at various locations within the region.

Sincerely,



Patrick M. Quinn

Planning and External Relations Program manager

c: David Pelser